

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re Petition of Marginalised Affected Property
Owners,
Applicant,

Civil Action No. 1:21-mc-00681

For an Order Granting Leave to Issue Subpoenas
To BSG Resources Limited, Alvarez & Marsal
Holdings, LLC, and Cleary Gottlieb Steen and
Hamilton, LLP, for Taking of Discovery Pursuant
to 28 U.S.C. § 1782

[PROPOSED] STIPULATED ORDER

WHEREAS, Petitioner and Respondent BSG Resources Limited, appearing through its Joint Administrators in bankruptcy (“BSGR”), wish to resolve this matter without Court intervention; and

WHEREAS, Petitioner and Respondent BSGR previously agreed on a plan for review of the documents produced to Petitioner and determination of any confidentiality needs,

WHEREAS Respondent subsequently complied with the terms of this plan,

WHEREAS, Petitioner and BSGR have had productive exchanges on the confidentiality status of the indicated documents but have concluded that extending the time limits for meeting and conferring could result in resolution of many – if not all – the outstanding differences relating to confidentiality of the produced documents without the need for further court intervention,

NOW THEREFORE, it is hereby stipulated and agreed, by and between Petitioner and Respondent BSGR, that:

1. The deadline for Petitioner and Respondents to submit a joint status report

to the Court is extended to January 26, 2024. Such status report shall include:

- a. The results of the initial review of the 126 high-priority documents, with the submission of any remaining disputes over confidentiality to the Court.
- b. The parties' proposal regarding confidentiality review of the remainder of the documents produced. To the extent the parties cannot agree on a joint proposal, the parties shall state their respective positions, including whether additional briefing is necessary (and if so, a schedule for submitting such briefing).

2. In the interim, the parties will continue to meet and confer on potential redactions to the 126 identified high-priority documents on a rolling basis.

SO ORDERED this _____ day of _____, 2024.

ONA T. WANG
United States Magistrate Judge